

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

YAN DING,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A",

Defendants.

Civil Action No. 4:25-cv-517

PLAINTIFF'S REQUEST FOR CLERK'S ENTRY OF DEFAULT

Pursuant to Fed. R. Civ. P. 55(a), Plaintiff Yan Ding ("Plaintiff") respectfully requests for the Clerk of this Court to enter default against Defendant ModernRoots-US ("Defaulting Defendant"). The Defaulting Defendant has failed to plead or otherwise defend this action. Therefore, the Clerk must now enter a default against the Defaulting Defendant.

Plaintiff brought this action on May 15, 2025, seeking affirmative relief for patent infringement. Dkt No. 1. The Defaulting Defendant was served with process on July 10, 2025. Dkt. No. 28. Despite proper service of process, the Defaulting Defendant has failed to plead or otherwise defend this action. Therefore, pursuant to Fed. R. Civ. P. 55(a), the Clerk must now enter a default against the Defaulting Defendant.

DATED: September 2, 2025

Respectfully submitted,

/s/ Nicholas Najera

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2025, the foregoing document was filed with the Court's ECF filing system which automatically served all Counsel of record with a copy via the ECF filing system.

/s/ Nicholas Najera
Nicholas Najera